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*Counsel for Defendant Google LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al*, individually and  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF ANDREW  
SCHAPIRO IN SUPPORT OF GOOGLE'S  
OPPOSITION TO PLAINTIFFS'  
MOTION TO STRIKE NON-RETAINED  
EXPERT DECLARATIONS FOR WHOM  
GOOGLE PROVIDED NO EXPERT  
REPORT**

The Honorable Yvonne Gonzalez-Rogers  
Courtroom 1 – 4<sup>th</sup> Floor  
Date: October 11, 2022  
Time: 2:00 pm

1 I, Andrew H. Schapiro, declare as follows:

2 1. I am a partner with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,  
3 counsel for Defendant Google LLC (“Google”) in this matter. I am an attorney at law duly licensed  
4 to practice before all courts of the State of Illinois and admitted to practice *pro hac vice* in the  
5 Northern District of California by this Court. Dkt. 37. I have personal knowledge of the matters set  
6 forth herein and am competent to testify.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs’ December 23,  
8 2020 First Set of Interrogatories to Google.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiffs’ October 7, 2020  
10 First Set of Requests for Admissions to Google.

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of transcript excerpts from  
12 the June 16, 2021 deposition of Glenn Berntson in this matter.

13 5. Attached hereto as **Exhibit 4** is a true and correct copy of Google’s September 17,  
14 2021 Verification of Google’s Responses and Objections to Plaintiffs’ Interrogatory No. 10.1.

15 6. Attached hereto as **Exhibit 5** is a true and correct copy of Google’s September 1,  
16 2021 Verification of Google’s Responses and Objections to Plaintiffs’ Interrogatory Nos. 10.2 &  
17 11.

18 7. Attached hereto as **Exhibit 6** is a true and correct copy of transcript excerpts from  
19 the March 23, 2022 deposition of Steve Ganem in this matter.

20 8. Attached hereto as **Exhibit 7** is a true and correct copy of transcript excerpts from  
21 the March 15, 2022 deposition of George Levitte in this matter.

22 9. Attached hereto as **Exhibit 8** is a true and correct copy of a document Google  
23 produced in this matter as GOOG-BRWN-00000302.

24  
25 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
26 and correct. Executed in Chicago, Illinois on September 14, 2022.

1 DATED: September 14, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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3  
4 By /s/ Andrew H. Schapiro

5 Andrew H. Schapiro

6 Attorney for Defendant  
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